

The Honorable John H. Chun

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF WASHINGTON

ELIZABETH R. PADDOCK,

Plaintiff,

Case No. 2:21-cv-00639

V.

PEACEHEALTH, INC. d/b/a ST.
JOSEPH'S MEDICAL CENTER and
PEACEHEALTH MEDICAL GROUP,
BELLINGHAM ANESTHESIA
ASSOCIATES, P.S., FOURTH CORNER
NEUROSURGICAL ASSOCIATES, INC.,
P.S., NORTHWEST RADIOLOGISTS,
INC., P.S., DAVID E. BAKER, M.D.,
JASON M. STOANE, M.D., PAUL B.
FREDETTE, M.D., JOHN E. MORRISON,
M.D., CARMEN V. HELLINGA, R.N.,
DAVID A. FLARRY, R.N., JOANNA B.
AXELSON, R.N., CAMILLE A. MILLER,
M.D., and TUNG M. HA, D.O.

Defendants.

**ORDER ON STIPULATED MOTION
FOR LEAVE TO FILE FIRST
AMENDED COMPLAINT**

**NOTE ON MOTION CALENDAR:
MARCH 7, 2023**

This matter has come before the Court on the Stipulated Motion for Leave to File First Amended Complaint of Plaintiff Elizabeth R. Paddock. Having reviewed the materials filed in favor of the motion and the remainder of the file, it is hereby **ORDERED** that the motion is

ORDER ON
STIPULATED MOTION FOR LEAVE
TO FILE FIRST AMENDED COMPLAINT - PAGE 1
No. 2:21-cv-00639

MOSELEY COLLINS LAW, APLC.
701 5th Avenue, Suite 4200
Seattle, WA 98104
(206) 333-2960; FAX (206) 452-1649

1 **GRANTED** and Plaintiff Elizabeth R. Paddock is granted leave to file her First Amended
2 Complaint. Pursuant to LCR 15, Plaintiff shall file and serve her First Amended Complaint
3 within fourteen (14) days of the filing of this order.

4 Signed this 8th day of March, 2023.

5
6 
7

8 John H. Chun
9 United States District Judge

10 Presented by:

11 MOSELEY COLLINS LAW, APLC

12 By: s/ John J. Kinney III
13 JOHN J. KINNEY III
14 WSBA # 53905
15 701 5th Avenue, #4200
16 Seattle, WA 98104
17 Telephone: 206-333-2960
18 Facsimile: 206-452-1649
19 Email: john@moseleycollins.com
20 Attorney for Plaintiff Elizabeth Paddock

CERTIFICATE OF SERVICE

I declare under penalty of perjury of the laws of the State of Washington that on the date below a copy of the foregoing **[PROPOSED] ORDER ON STIPULATED MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT**, was forwarded for service upon counsel of record as follows:

**Counsel for Defendants David Baker,
Forth Corner Neurosurgical Associates**

- Regular US Mail.
- Facsimile
- Personal Service
- Email/ECF

Scott O'Halloran
Simon P. Youngbloom
FAVROS LAW
1301 A Street, Suite 900
Tacoma, WA 98402
Scott@favros.com
Simon@favros.com
Deannah@favros.com
Cindy@favros.com
Alex@favros.com

Counsel for Defendants Carmen Hellinga,
PeaceHealth Inc. d.b.a. St. Joseph's Medical
Center and PeaceHealth Medical Group, David
Flarry, and Joanna Axelson

- Regular US Mail.
- Facsimile
- Personal Service
- Email/ECF

Jennifer Moore
Lauren Martin
BENNET BIGELOW & LEEDOM, P.S.
601 Union Street, Suite 1500
Seattle, Washington 98101-1363
jmoore@bbllaw.com
lmartin@bbllaw.com
ffusaro@bbllaw.com
CBaughn@bbllaw.com
eservice@bbllaw.com

**Counsel for Defendants Bellingham Anesthesia
Associates and John Morrison**

- Regular US Mail.
- Facsimile
- Personal Service
- Email/ECF

Phil deMaine
Brennen J. Johnson
JOHNSON, GRAFFE, KEAY, MONIZ & WICK
2115 N. 30th St., Suite 101
Tacoma, WA 98403
phild@jgkmw.com

ORDER ON
STIPULATED MOTION FOR LEAVE
TO FILE FIRST AMENDED COMPLAINT - PAGE 3
No. 2:21-cv-00639

MOSELEY COLLINS LAW, APLC.
701 5th Avenue, Suite 4200
Seattle, WA 98104
(206) 333-2960; FAX (206) 452-1649

1 brennenj@jgkmw.com
2 BethB@jgkmw.com
2 kellys@jgkmw.com

3 **Counsel for Defendants Paul B. Fredette, M.D.**

4 Ketia B. Wick
5 Caleb T. Mathena
FAVROS LAW
6 701 Fifth Avenue, Suite 4750
Seattle, WA 98104
ketia@favros.com
caleb@favros.com
emilym@favros.com
kenya@favros.com
nikki@favros.com

□ Regular US Mail.
□ Facsimile
□ Personal Service
 Email/ECF

10 Executed on March 8, 2023, at El Dorado Hills, CA.

12 /s/ Joshua Cordova
13 Joshua Cordova

14
15
16
17
18
19
20
21
22
23
24
25
26
ORDER ON
STIPULATED MOTION FOR LEAVE
TO FILE FIRST AMENDED COMPLAINT - PAGE 4
No. 2:21-cv-00639

MOSELEY COLLINS LAW, APLC.
701 5th Avenue, Suite 4200
Seattle, WA 98104
(206) 333-2960; FAX (206) 452-1649